

**FILED**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

12:14 pm Oct 25 2017  
Clerk U.S. District Court  
Northern District of Ohio  
Toledo

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Matthew Seifert, a Law Enforcement Agent with the United States Customs and Border Protection, United States Border Patrol, hereinafter referred to as your Affiant, being duly sworn, deposes and states:

**INTRODUCTION**

1. Affiant makes this affidavit in support of a criminal complaint and arrest warrant. This affidavit is made based on my own personal knowledge and derived from credible law enforcement sources. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
2. Based on the information set forth below, your Affiant believes Martha BUENDIA-CHAVARRIA is a national and citizen of Mexico, is an alien illegally present in the United States, there is probable cause that BUENDIA-CHAVARRIA is an imposter using without lawful authority the identity of a United States Citizen named T.M., has been producing and transferring false identity documents, and has violated the following federal criminal laws: Title 18, United States Code, Section 911 (False personation of a United States citizen), 1015(e) (False statement or claim of citizenship to obtain a federal or state benefit), 1028(a)(3) (Possession with intent to transfer unlawfully five or more identification documents or false identification documents); and 1028A(a)(1) (Aggravated identity theft).

**TRAINING AND EXPERIENCE**

3. Affiant has been a law enforcement agent of the Department of Homeland Security, United States Customs and Border Protection, United States Border Patrol since March of 2010. Affiant has over seven (7) years of specialized law enforcement training and experience to include, but not limited to, the detection and apprehension of undocumented foreign nationals, the detection and investigation of the sale/use of fraudulent documents and the apprehension of fraudulent document users (imposters), and the detection and interdiction of narcotics and human smugglers/traffickers and other criminal individuals. Affiant has been trained in the laws of search and seizure at the United States Border Patrol Academy in Artesia, New Mexico and has received subsequent training in the utilization, preparation, and execution of search and seizure warrants as a member of a multi-jurisdictional narcotics taskforce.

4. Affiant has approximately two (2) years of experience investigating the manufacturing, distribution, and use of controlled substances while being a member of a multi-jurisdictional narcotics taskforce known as the Upper Peninsula Substance Enforcement Team (UPSET) and has participated in approximately 200 controlled substance investigations. Affiant has utilized informants and undercover officers to conduct the controlled purchases of controlled substances, conducted or participated in surveillance, conducted interviews of both witnesses and suspects, executed felony arrests, and drafted and executed search warrants and other court orders which resulted in the seizure of dangerous drugs, and the records, books, and proceeds derived from illicit activity.
5. Affiant has approximately one (1) year experience as a member of the Field Intelligence Unit at the Sandusky Bay Border Patrol Station in Port Clinton, Ohio, with the purpose of conducting intelligence driven operations/investigations. Affiant has interviewed, witnessed the interview of, and participated in the debriefing of numerous illegal aliens that have claimed they have purchased fraudulently obtained, altered, or counterfeit documents. Through this experience your affiant has in depth knowledge concerning the trade of fraudulent documents. Affiant has investigated both criminal and administrative violations of law pertaining to immigration, controlled substances, and identity theft.
6. Affiant is currently assigned to the Detroit Sector Intelligence Unit (SIU) as a U.S. Border Patrol Intelligence Agent (BPA (I)) with the purpose of collecting, analyzing, and disseminating current intelligence information through the production of intelligence products, and conducting/supporting intelligence driven and targeted enforcement operations/investigations.

#### **PROBABLE CAUSE**

7. On July 20, 2017, a criminal investigation resulted in the execution of a federal search warrant at 121 Keefer Court, Willard, OH and a federal arrest warrant for Manuel GRANADOS. The search and arrest warrants were executed during a joint operation between members of the Detroit Sector Intelligence Unit (SIU), the Sandusky Bay Field Intelligence Unit (FIU), and the Detroit Sector Tactical Unit (BORTAC).
8. On July 20, 2017, U.S. Border Patrol Field Intelligence Agents (FIA) Christopher Schaeffer and Tim Nickell interviewed a subject (hereinafter "Person 1") that the agents encountered during the execution of the search warrant at 121 Keefer Court listed in paragraph 7. Information received from this interview stated that GRANADOS would travel to either the Papa Johns restaurant or the Dominos restaurant in Marion, OH, meet with a Hispanic female that drove a silver/gray Chrysler 300, and obtain a folded white paper/envelope that may contain identity

documents. Person 1 further stated that the contact name for the Hispanic female on GRANADOS' cellular phone was "Marion ID."

9. On July 20, 2017, during the search at 121 Keefer Court, agents seized two false identity documents packaged in a folded white piece of paper in what was believed to be GRANADOS' bedroom. These documents were identified as a false Texas state identification card and a false social security card, both bearing the name "Israel BARAJAS." The Texas state identification card identified the date of birth as 07/15/1985. The social security card identified the social security number 625-15-4612. The forensic data extraction listed in paragraph 12 suggest the transaction for these identity documents occurred on or about July 09, 2016.
10. On July 20, 2017, during the search at 121 Keefer Court, agents seized approximately 11 false social security cards, two false state identification cards, and three Lawfully Admitted Permanent Resident cards.
11. On July 20, 2017, during the execution of the search warrant at 121 Keefer Court listed in paragraph 7, agents seized a black Samsung Galaxy Grand Prime touchscreen smartphone. This cellular phone will hereinafter be referred to as PHONE 1.
12. On August 1, 2017, a search warrant was obtained to extract the data contained on PHONE 1. Two forensic data extractions were performed on PHONE 1; one by Detective James Dec from the Toledo Police Department and the second by Border Patrol Intelligence Agent (BPA (I)) Mark Kutrip.
13. Analysis of the forensic data extractions listed in paragraph 12 revealed the following identifiable information of PHONE 1:
  - a. Manufacturer: Samsung  
Model: SM-S920L  
MEID: 256691547407734309 (HEX: 99000592760425)  
ICCID: 89148000002536962423  
MSISDN: 5672246374
14. Through the investigation into Manuel GRANADOS, the primary cellular phone number, or MSISDN, associated with Manuel GRANADOS was identified as (567) 224-6374.
15. Forensic analysis of the data extracted from PHONE 1 indicated that GRANADOS, using PHONE 1, purchased, or otherwise obtained, false or stolen identity documents from other individuals. The analysis of PHONE 1 revealed approximately 76 identity document transactions between GRANADOS and individuals using phone numbers (281) 409-2751 and (419) 217-6879. The identity document transactions were identified through analysis of SMS text

messages and multimedia messages that PHONE 1 exchanged with the users of the phone number (281) 409-2751 and (419) 217-6879.

16. The 76 identity document transactions included requests from GRANADOS for state identification cards, social security cards, and Lawfully Admitted Permanent Resident (LAPR) cards. The majority of the transactions include photographs of Hispanic males and females taken against stark white backgrounds. Your affiant believes these photographs to be photographs of the end users of the requested false identity documents. Through your affiant's previous training and experience, including education and professional experience as graphic designer, your affiant recognizes this technique as a common technique used when the end goal is to digitally remove a person or an object from the background of a photograph or digitally insert a person into a photograph.
17. Analysis of the forensic data extractions listed in paragraph 12 revealed that 52 of the 76 identity document transactions occurred between PHONE 1 and the phone number (281) 409-2751, where the user of phone number (281) 409-2751 transferred identity documents or false identity documents to the user of PHONE 1. For example, on July 9, 2016, PHONE 1 sent messages to (281) 409-2751, which appear to relate to the transfer of identity documents or false identity documents connected to "Israel Barajas." PHONE 1 sent a text message which translated to "Israel Barajas 07/15/1985 ss 625156412 Blue with Texas." Your affiant believes this to be a reference to the name and identifies of false identification documents: specifically, a Texas state identification card and (blue) social security card. These documents were located during the search at 121 Keefer Court, as described in paragraph 9. This phone number (281) 409-2751 was saved in PHONE 1 as a contact under the name, "CD Marion." As described below, an investigation conducted on this phone number lead your affiant to believe that the user is Martha BUENDIA-CHAVARRIA.
18. Analysis of the forensic data extractions listed in paragraph 12 revealed that 24 of the 76 identity document transactions occurred between PHONE 1 and the phone number (419) 217-6879, where the user of phone number (419) 217-6879 transferred identity documents or false identity documents to the user of PHONE 1. This phone number was saved in PHONE 1 as a contact under the name "CDs Michael." An investigation conducted on this phone number lead your affiant to believe that the user is Eliazar LOPEZ-BRAVO.
19. Open source intelligence (OSINT) revealed the last registered owner of phone number (281) 409-2751 to be T.M. out of Marion, OH.
20. OSINT revealed T.M. to have concurrent addresses in both Ohio and Puerto Rico.
21. Law enforcement databases revealed a valid Ohio Driver License under T.M.'s name (DLN: TS936603).

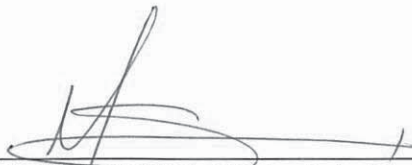
22. Law enforcement databases and OSINT revealed a current address for T.M., under Ohio driver's license number: TS936603, to be 128 Sharpless Court, Marion, OH. OSINT further revealed this address to be located within a .5 mile radius from both the Papa Johns and Dominos listed in paragraph 8.
23. Law enforcement databases revealed a silver/gray Chrysler 300 registered under T.M.'s name and Ohio driver's license number: TS9366003. The vehicle matches the description of the Chrysler 300 listed in paragraph 8.
24. Law enforcement databases revealed T.M. to have a Social Security Number (SSN) of 583-83-2765. OSINT along with your affiant's training and experience reveals this SSN to be issued out of Puerto Rico.
25. Law enforcement databases revealed that a valid United States passport was issued in T.M.'s name and associated with SSN 583-83-2765. The passport number for this U.S. passport is 467551536.
26. Your affiant conducted a photograph comparison of the passport photograph on U.S. Passport 467551536 and the Ohio Driver License photograph on Ohio Driver License TS9366003. These photographs do not match and depict different Hispanic females.
27. Based upon the above listed facts, a request for driver license information was submitted to the United States Border Patrol Ramey Sector Intelligence Unit in Puerto Rico regarding the name and personal identifiers of T.M. Border Patrol Intelligence Agent (BPA (I)) Luis Capestany returned the request for information with a Driver License photograph from Puerto Rico associated to the name T.M. and SSN: 583-83-2765.
28. Your affiant conducted a photograph comparison of both Driver License photographs from Puerto Rico and Ohio with the photograph on U.S. Passport 467551536. The photograph contained on U.S. Passport 467551536 depicts the same Hispanic female as the Driver License photograph from Puerto Rico.
29. Further analysis of OSINT (i.e., Accurint) of 128 Sharpless Court, Marion, OH (current Ohio address for the individual identified as T.M. on OH driver's license TS9366003) revealed Martha BUENDIA-CHAVARRIA to be a resident at 128 Sharpless Court from April 2017 to August 2017.
30. Law enforcement databases revealed that Martha BUENDIA-CHAVARRIA (DOB: 02/22/1974, COC: Mexico, Alien File (A-file) Number: 216338373) to be a citizen and national of Mexico, illegally present in the United States. On May 11, 2017, Martha BUENDIA-CHAVARRIA had her fingerprints and photograph captured on an application for asylum (CBP Form I-589).



31. Your affiant conducted a photograph comparison of the photograph of Martha BUENDIA-CHAVARRIA located in CPB Form I-589 and the photograph of the individual identified on the Ohio Driver License issued in T.M.'s name with Ohio Driver's License number TS9366003. These photographs depict the same Hispanic female.
32. Certified Ohio BMV records indicate that Martha BUENDIA-CHAVARRIA applied for and was issued a valid form of identification under the name T.M. approximately five times between 11/24/2009 and 02/04/2017. On each application for Driver License / Identification Card / Permit, Martha BUENDIA-CHAVARRIA is listed as a United States Citizen under the name T.M. On each application, Martha BUENDIA-CHAVARRIA signed T.M.'s name attesting that the information contained on the application, including citizenship status, was true.
33. On August 09, 2017, your affiant provided information to Homeland Security Investigations (HSI) Special Agent (SA) Vincent Fazio regarding phone number (281) 409-2751. SA Fazio issued a subpoena for subscriber information and phone tolls for (281) 409-2751. Subpoena information revealed the subscriber for phone number (281) 409-2751 to be Gerardo FLORES at 1185 Lake Boulevard, Marion, OH.
34. Subpoena information also revealed that from May 2017 to August 2017 phone number (419) 217-6879 sent 226 picture/video messages that contained 677 attachments to phone number (281) 409-2751. This information indicates similar message activity to the activity identified during analysis GRANADOS's cellular phone as described in paragraph 15.
35. Information obtained from Martha BUENDIA-CHAVARRIA's A-file revealed Gerardo FLORES and Martha BUENDIA-CHAVARRIA were married at one time and conceived one child together. A-file information also revealed Martha BUENDIA-CHAVARRIA listed her current phone number as (281) 409-2751 and current address as 128 Sharpless Court, Marion, OH 43302 on CBP Form I-589. Martha BUENDIA-CHAVARRIA does not list the use of any other names or aliases on the CBP form I-589. The CBP form I-589 was completed on May 11, 2017.
36. Based upon the above information, Martha BUENDIA-CHAVARRIA is believed to be using without lawful authority the name and identifiers of United States Citizen T.M. BUENDIA-CHAVARRIA is also believed to be the user of phone number (281) 409-2751 and the individual who was involved in the possession with intent to transfer five or more identification documents or false identification documents as described in paragraphs 15 through 17.
37. On August 11, 2017 your affiant and Supervisory Border Patrol Agent William Stack conducted a custodial interview of a recently apprehended undocumented

alien (UDA) at the Sandusky Bay Border Patrol Station. During the interview, the UDA advised of two document vendors operating in the Willard, OH area. Your affiant and SBPA Stack conducted two photographic lineups comprised of six photographs each. The UDA identified Manuel GRANADOS, known to the UDA as R.P., and Eliazar LOPEZ-BRAVO, known to the UDA as "Michael," as document vendors operating in the Willard, OH area.

38. During the interview in paragraph 37, the UDA advised LOPEZ-BRAVO manufactures identity documents at his residence along with his wife. The UDA continued to advise that the UDA believed LOPEZ-BRAVO had a machine to manufacture documents at his residence. The UDA advised the UDA purchased a false Lawfully Admitted Permanent Resident Card (LAPR) from LOPEZ-BRAVO for \$100 USD.
39. During the interview in paragraph 37, the UDA advised that GRANADOS would take orders from illegal aliens for false identity documents and would travel to Marion, OH to receive the false identity documents once he had three or more document orders. The UDA continued to advise GRANADOS would sometimes travel to Marion, OH twice in one day to pick up false identity documents. The UDA advised that GRANADOS would make arrangements for the transfer of false identity documents in the UDA's presence.
40. Based upon the above information, there is probable cause that Martha BUENDIA-CHAVARRIA has violated the following federal criminal laws:
  - a. False personation of a United States citizen, in violation of Title 18, United States Code, Section 911;
  - b. False statement under oath in a matter relating to naturalization and citizenship in order to obtain a benefit, in violation of Title 18, United States Code, Section 1015(e);
  - c. Possession with intent to transfer unlawfully five or more identification documents or false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3); and
  - d. Aggravated identity theft, in violation of Title 18, United States Code, Section 1028A

  
Matthew Seifert, Border Patrol Intelligence Agent  
United States Customs and Border Protection  
Department of Homeland Security

**Oct 25, 2017**

Sworn to via telephone after  
submission by reliable electronic  
means. Crim. Rules. 4.1; 41(d)(3)



A handwritten signature in black ink, appearing to read "James R. Knepp, II".

James R. Knepp, II  
United States Magistrate Judge